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578-15.

USDC SDNY DOCUMENT ELECTRONICALLY FILED DOC #: DATE FILED: 4/29/08
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UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

UNITED STATES OF AMERICA,

-v.-

ROBERT COPLAN, MARTIN NISSENBAUM,
RICHARD SHAPIRO, BRIAN VAUGHN,
DAVID L. SMITH, and CHARLES BOLTON

Defendants.

**STIPULATION AND PROPOSED
SEALING ORDER**

(S1) 07 Cr. 453 (SHS)

IT IS STIPULATED AND AGREED, by and between the United States and counsel for Defendant Charles E. Bolton ("Mr. Bolton"), that:

WHEREAS, on May 5, 2008, Mr. Bolton will file a motion to transfer venue of his trial in the above-captioned matter to his home city of Memphis, Tennessee, pursuant to Federal Rule of Criminal Procedure 21(b) (the "Motion"), which Motion, brief in support of the Motion and supporting papers will contain certain information that is confidential and personal to Mr. Bolton;

WHEREAS, the government's response brief in opposition to the Motion and Mr. Bolton's reply brief in support of the Motion may also contain certain confidential and personal information;

NOW, THEREFORE, it is hereby stipulated and agreed by and between the United States and counsel for Mr. Bolton that Mr. Bolton may file under seal certain portions of the brief in support of the Motion, the reply brief in support of the motion, and any relevant supporting exhibits which reflect any information that is confidential or personal to Mr. Bolton;

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and the government shall file under seal any portions of its response brief in opposition to the Motion and any relevant supporting exhibits which reflect any information that is confidential or personal to Mr. Bolton.

Date: April 28, 2008
New York, New York

By: 
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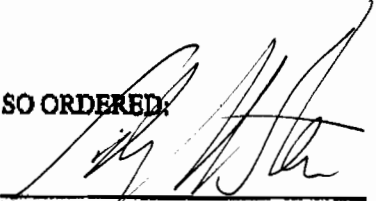
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Attorneys for Defendant
Charles E. Bolton

Dated: April  2008

SO ORDERED:


HONORABLE SIDNEY H. STEIN
UNITED STATES DISTRICT JUDGE